

Phillips Lytle LLP



October 8, 2013

Hon. John T. Curtin United States District Judge U.S. Courthouse 2 Niagara Square Buffalo, New York 14202

Re:

Geris v. DiSilva Taunton Express, Inc.

Civil Case No.: 1:07-CV-376-JTC

Dear Judge Curtin:

In accordance with your instructions, the parties have conferred and submit this joint proposal to request that the discovery scheduling order in this matter be modified as follows:

- Defendants complete their depositions of plaintiffs' experts by December 15, 2013; and
- Plaintiffs complete their depositions of defendants' experts by March 15, 2014.

Thank you for your consideration.

Very truly yours,

Phillips Lytle LLP

Paul Morrison-Taylor

CAhmm2/Doc #01-2712545.1

cc: Joshua P. Rubin, Esq.

ATTORNEYS AT LAW

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